

## **REMARKS**

Claims 1-23 are pending in the application. Claims 1-23 have been rejected. Claim 1 has been amended to further clarify the claimed invention. No claims have been added or canceled. Therefore, claims 1-23 remain pending in the application.

Applicant gratefully acknowledges the time and attention afforded by Examiner Gilles during a telephonic interview on May 17, 2007. During the interview, Applicant's representative and Examiner Gilles discussed the cited reference, the claimed invention, and the non-anticipatory and non-obvious nature of the claims in view of the reference. In particular, Applicant's representative noted that the cited reference fails to teach generating a range of concentric user-targeted content that is correlated in varying degrees to a preference of a user. Examiner Gilles agreed to reconsider the application in view of the discussion during the telephonic interview.

Claims 1-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,155,508 ("Sankuratripati"). With respect to independent claim 1, the Office Action contends that Sankuratripati teaches "obtain[ing] a range of concentric content . . . such that said range of content is correlated in varying degrees to said generated preference for said participating user" (Office Action dated March 22, 2007 ("Office Action") at p. 3). Applicant respectfully disagrees.

Claim 1 recites, in part, an instruction set that operates on a preference of a user. The instruction set obtains a range of concentric user-targeted content that is correlated in varying degrees to the preference.

The present specification notes that "[c]urrent online content is generally categorized in 'content verticals' – or more accurately, is aligned around a single, or a set of specific subject matter areas" (*Specification* at p. 2, ll. 21-23). For example, "content service providers using current profiling practices may only offer basketball related content in response to [a] user's 76ers search" (*id.* at p. 2, ll. 23-24). As a result, content service providers' profiling practices typically are too focused, *i.e.*, they do "not avail[] or account[] for the user's preferences *in totem*" (*id.* at p. 2, ll. 23-26).

In an effort to overcome the limitations associated with prior art profiling systems, the claimed embodiments deliver a range of concentric user-targeted content that is correlated in

varying degrees to one or more of a user's preferences. As such, the user is offered additional relevant content that is more representative of the user's preferences *in totem*. (*id.* at p. 15, ll. 20-23).

Sankuratripati does not disclose a range of concentric user-targeted content that is correlated in varying degrees to one or more of a user's preferences. Rather, Sankuratripati suffers from the same deficiency identified by Applicant with respect to existing profiling systems; namely, aligning content around specific subject matter areas, and not accounting for the user's preferences *in totem*.

More specifically, Sankuratripati discloses a profiling system that packages and communicates user profile data to ad sources (Sankuratripati at col. 3, ll. 1-2). The system enables the ad sources to select and deliver ads to the user based on slight changes in the user's profile data (*id.* at col. 3, ll. 2-4). The system includes a preference-data generation server that generates preference data using data mined from the user's profile data (*id.* at col. 4, ll. 1-3). The generated preference lists are sent to an ad server that matches the ads to the generated preference list and delivers the matched ads to the user (*id.* at col. 4, ll. 60-63). As noted in Sankuratripati, the ads "are selected according to the appropriate **theme or themes** defined in the categorized preference lists . . . ." (*id.* at col. 11, ll. 55-58) (emphasis added). In other words, Sankuratripati's ads are aligned around specific subject matter areas.

Thus, Sankuratripati does not teach a range of concentric user-targeted content that is correlated in varying degrees to one or more of a user's preferences. Applicant respectfully submits, therefore, that claim 1 patentably defines over the cited reference.

Independent claim 17 recites, in part, a range of concentric user-targeted content that is matched to the user's preference with varying degrees of certainty. Independent claim 22 recites, in part, a range of concentric user-targeted content that includes content levels differing on a graduated basis. Applicant respectfully submits, therefore, that claims 17 and 22 patentably define over the cited reference for at least the same reasons discussed above.

As claims 2-16 depend from claim 1, claims 18-21 depend from claim 17, and claim 23 depends from claim 22, Applicant further submits that the dependent claims are likewise allowable.

Accordingly, Applicant respectfully requests that the rejection of claims 1-23 under 35 U.S.C. § 102(e) be withdrawn.

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**PATENT**

### **CONCLUSION**

Applicant respectfully submits that the claims are allowable and that the present application is in condition for allowance. Reconsideration of the application and an early Notice of Allowance are respectfully requested. In the event that the Examiner cannot allow the present application for any reason, the Examiner is encouraged to contact the undersigned attorney, Bryan T. Giles at (215) 564-8954, to discuss the resolution of any remaining issues.

Respectfully submitted,

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